



Application GRANTED. Defendants' deadline to produce any Rule 26.2 materials for witnesses whom they intend to call during their case-in-chief, and to provide the Government with summary witness materials related to tracing blockchain transactions and financial transactions, is adjourned to **March 30, 2020**.

**BY ECF AND EMAIL**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

The Supplemental Protective Order will issue separately.

Dated: **March 9, 2020**  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**Re: *United States v. Sohrab Sharma, et al., 18 Cr. 340 (LGS)***

Dear Judge Schofield:

The Government respectfully submits this letter to update Your Honor regarding the Government's production of *Jencks* Act materials, and to request, jointly with the defendants, that the Court (a) enter the enclosed supplemental protective order restricting the dissemination of materials produced by the Government pursuant to 18 U.S.C. § 3500 and/or Federal Rule of Criminal Procedure 26.2, to which the parties have all agreed and consented, and (b) extend the defendants' March 23, 2020 deadline to produce any Rule 26.2 materials for witnesses whom they intend to call during their case-in-chief, and to provide the Government with summary witness materials related to tracing blockchain transactions and financial transactions, to March 30, 2020.

Subject to the defendants' good faith and reasonable efforts to enter into stipulations that spare the Government the time and resources of preparing and calling custodial witnesses, the Government will begin producing *Jencks* Act materials, pursuant to the Court's March 5, 2020 Scheduling Order (Dkt. 294) on March 9, 2020. The Government respectfully requests that its provision of *Jencks* Act materials this far in advance of trial be subject only to the defendants' good faith and reasonable efforts to enter into stipulations. The Government reserves the right, absent good faith and reasonable efforts by the defense, to object to the March 9, 2020 deadline. *See United States v. Coppa*, 267 F3d. 132, 145 (2d Cir. 2001) ("We have previously held that *Jencks* Act prohibits a District Court from ordering the pretrial disclosure of witness statements." ) (citations omitted).

Hopeful that the defendants' engage in good faith and reasonable efforts to enter into stipulations by March 9, 2020, the Government respectfully requests that the Court enter the enclosed supplemental protective order (the "Supplemental Protective Order"), agreed and consented to by all of the parties, to govern materials produced by the Government pursuant to 18 U.S.C. § 3500 and/or Federal Rule of Criminal Procedure 26.2. Subject to the defendant's good faith and reasonable efforts to enter into stipulations, and upon entry of the Supplemental

Honorable Lorna G. Schofield

March 7, 2020

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Protective Order, the Government will begin producing *Jencks* Act materials pursuant to the Court's March 5, 2020 Scheduling Order.

Finally, the parties jointly request that the Court extend the defendants' March 23, 2020 deadline to produce (i) any rule 26.2 materials for witnesses whom they intend to call in their case-in-chief, and (ii) reciprocal discovery regarding summary witness testimony related to tracing blockchain transactions and financial transactions, including Rule 26.2 materials and draft summary chart exhibits (*see* Dkt. 264) by one week to March 30, 2020, consistent with the one-week adjournment of other trial-related deadlines reflected in the Court's March 5, 2020 Scheduling Order.

Respectfully submitted,

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Attorney for the United States  
Acting Under 28 U.S.C. § 515

By: \_\_\_\_\_/s\_\_\_\_\_  
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cc: All counsel (via ECF)